

DELBELLO DONNELLAN WEINGARTEN  
WISE & WIEDERKEHR, LLP  
*Counsel for Greenhorn Ventures LLC*  
One North Lexington Avenue  
White Plains, New York 10601  
(914) 681-0200  
Dawn Kirby, Esq.

**Hearing Date: December 20, 2018**  
**Hearing Time: 10:00 a.m.**

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

In re	:	Chapter 11
SEARS HOLDINGS CORPORATION, <i>et al.</i> ,	:	Case No. 18-23538 (RDD)
	:	
	:	(Jointly Administered)
Debtors.	:	

**NOTICE OF MOTION OF GREENHORN VENTURES LLC FOR ORDER (I)  
COMPELLING THE DEBTOR TO REJECT A NONRESIDENTIAL REAL PROPERTY  
LEASE PURSUANT TO 11 U.S.C. § 365(d)(2); OR IN THE ALTERNATIVE (II)  
ESTABLISHING A DEADLINE BY WHICH THE DEBTOR MUST ASSUME AND  
CURE ALL DEFAULTS OR REJECT THE LEASE; AND (III) MODIFYING THE  
AUTOMATIC STAY TO PERMIT GREENHORN VENTURES LLC TO PURSUE ITS  
RIGHTS, INCLUDING THOSE RELATED TO THE DEBTOR'S CONTINUING  
DEFAULTS UNDER THE LEASE PURSUANT TO 11 U.S.C. §362(d)(1)**

**PLEASE TAKE NOTICE**, that upon the annexed motion (the "Motion") of Greenhorn Ventures LLC (the "Movant"), by its attorneys DelBello, Donnellan, Weingarten, Wise & Wiederkehr, LLP, the undersigned will move this Court, before the Honorable Robert D. Drain, United States Bankruptcy Judge, at the United States Bankruptcy Court, 300 Quarropas Street, White Plains New York 10601 on the 20<sup>th</sup> day of December, 2018 at 10:00 a.m., or as soon thereafter as counsel may be heard for the entry of the proposed (I) Compelling Debtor to Reject Real Property Lease Pursuant to 11 U.S.C. § 365(d)(2); or in the alternative (II) Establishing a Deadline By Which the Debtor Must Assume and Cure all Defaults Under the Lease or Reject the Lease; and (III) Modifying the Automatic Stay to Permit Greenhorn Ventures LLC to Pursue

its Rights, Including Those Related to the Debtor's Continuing Defaults Under the Lease pursuant to 11 U.S.C. §362(d)(1), together with such other and further relief as is just, proper and equitable under the circumstances (the "Motion").

**PLEASE TAKE NOTICE,** that objections to the relief requested in the Motion must be in writing, stating with specificity the basis or bases on which such party in interest objects to the within Motion, filed with the Bankruptcy Court at the Court's website [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov) (Password and Login Required) and must be served upon DelBello, Donnellan, Weingarten, Wise & Wiederkehr, LLP, One North Lexington Avenue, White Plains, New York 10601, Attn: Dawn Kirby, Esq., so as to be filed and served no later than seven (7) days prior to the hearing date.

Dated: White Plains, New York  
November 30, 2018

DELBELLO DONNELLAN WEINGARTEN  
WISE & WIEDERKEHR, LLP  
*Counsel for the Debtor*  
One North Lexington Avenue  
White Plains, New York 10601  
(914) 681-0200

By: /s/ Dawn Kirby  
Dawn Kirby